

MINOR SOURCE OPERATING PERMIT OFFICE OF AIR QUALITY

**Elk Properties, LLC.
3008 Mobile Drive
Elkhart, Indiana 46514**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the emission units described in Section A (Source Summary) of this permit.

This permit is issued to the above mentioned company under the provisions of 326 IAC 2-1.1, 326 IAC 2-6.1 and 40 CFR 52.780, with conditions listed on the attached pages.

Operation Permit No.: MSOP 039-15151-00357	
Issued by: Original Signed by Paul Dubenetzky Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: March 21, 2002

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SECTION A

SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-5.1-3(c)] [326 IAC 2-6.1-4(a)]

The Permittee owns and operates a plastic parts surface coating operation.

Authorized Individual: Jim Brown
Source Address: 3008 Mobile Drive, Elkhart, IN 46514
Mailing Address: 3008 Mobile Drive, Elkhart, IN 46514
County Location: Elkhart
County Status: Maintenance attainment for ozone
Attainment for all other criteria pollutants
Source Status: Minor Source, under PSD or Emission Offset Rules;
Minor Source, Section 112 of the Clean Air Act

A.2 Emissions units and Pollution Control Equipment Summary

This stationary source is approved to operate the following emissions units and pollution control devices:

- (1) Three (3) plastic parts surface coating booths, identified as Booths 1, 2, and 3, respectively, located in the spray coating building, with the particulate emissions from each booth controlled by a dry filter system, and the emissions exhausted through Stacks E1, E2, and E3, respectively,
- (2) One (1) 11.165 MMBtu/hr natural gas fired air make-up unit, identified as H1, located in the spray coating building,
- (3) Four (4) 0.1 MMBtu/hr natural gas fired radiant heaters, identified as H6, H7, H8, and H9, respectively, located in the warehouse building, and
- (4) Four (4) 0.3 MMBtu/hr natural gas fired space heaters, identified as H2, H3, H4, and H5, respectively, located in the warehouse building.

SECTION B GENERAL CONSTRUCTION CONDITIONS

THIS SECTION OF THE PERMIT IS BEING ISSUED UNDER THE PROVISIONS OF 326 IAC 2-1.1 AND 40 CFR 52.780, WITH CONDITIONS LISTED BELOW.

B.1 Permit No Defense [IC 13]

This permit to construct does not relieve the Permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.

B.2 Definitions

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, any applicable definitions found in IC 13-11, 326 IAC 1-2, and 326 IAC 2-1.1-1 shall prevail.

B.3 Effective Date of the Permit [IC13-15-5-3]

Pursuant to IC 13-15-5-3, this permit becomes effective upon its issuance.

B.4 Revocation of Permits [326 IAC 2-1.1-9(5)]

Pursuant to 326 IAC 2-1.1-9(5)(Revocation of Permits), the Commissioner may revoke this permit if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.

B.5 Modification to Permit [326 IAC 2]

Notwithstanding the Section B condition entitled "Minor Source Operating Permit", all requirements and conditions of this construction permit shall remain in effect unless modified in a manner consistent with procedures established for modifications of construction permits pursuant to 326 IAC 2 (Permit Review Rules).

B.6 Minor Source Operating Permit [326 IAC 2-6.1]

This document shall also become a minor source operating permit pursuant to 326 IAC 2-6.1 when, prior to start of operation, the following requirements are met:

- (a) The attached Affidavit of Construction shall be submitted to the Office of Air Quality (OAQ), Permit Administration & Development Section.
 - (1) If the Affidavit of Construction verifies that the facilities covered in this Construction Permit were constructed as proposed in the application, then the facilities may begin operating on the date the Affidavit of Construction is postmarked or hand delivered to IDEM.
 - (2) If the Affidavit of Construction does not verify that the facilities covered in this Construction Permit were constructed as proposed in the application, then the Permittee shall receive an Operation Permit Validation Letter from the Chief of the Permit Administration & Development Section prior to beginning operation of the facilities.
- (b) If construction is completed in phases; i.e., the entire construction is not done continuously, a separate affidavit must be submitted for each phase of construction. Any permit conditions associated with operation start up dates such as stack testing for New Source Performance Standards (NSPS) shall be applicable to each individual phase.

- (c) Upon receipt of the Operation Permit Validation Letter from the Chief of the Permit Administration & Development Section, the Permittee shall attach it to this document.
- (d) The operation permit will be subject to annual operating permit fees pursuant to 326 IAC 2-1.1-7(Fees).
- (e) Pursuant to 326 IAC 2-6.1-7, the Permittee shall apply for an operation permit renewal at least ninety (90) days prior to the expiration date established in the validation letter. If IDEM, OAQ, upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect until the renewal permit has been issued or denied. The operation permit issued shall contain as a minimum the conditions in Section C and Section D of this permit.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

C.1 Preventive Maintenance Plan [326 IAC 1-6-3]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMP) after issuance of this permit, including the following information on each emissions unit:
 - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions;
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.
- (b) The Permittee shall implement the Preventive Maintenance Plans as necessary to ensure that failure to implement the Preventive Maintenance Plan does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) PMP's shall be submitted to IDEM, OAQ, upon request and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ, may require the Permittee to revise its Preventive Maintenance Plan whenever lack of proper maintenance causes or contributes to any violation.

C.2 Permit Revision [326 IAC 2-5.1-3(e)(3)] [326 IAC 2-6.1-6]

- (a) The Permittee must comply with the requirements of 326 IAC 2-6.1-6 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

Any such application should be certified by the "authorized individual" as defined by 326 IAC 2-1.1-1.

- (c) The Permittee shall notify the OAQ within thirty (30) calendar days of implementing a notice-only change. [326 IAC 2-6.1-6(d)]

C.3 Inspection and Entry [326 IAC 2-5.1-3(e)(4)(B)] [326 IAC 2-6.1-5(a)(4)]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a permitted source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) Have access to and copy, at reasonable times, any records that must be kept under this title or the conditions of this permit or any operating permit revisions;
- (c) Inspect, at reasonable times, any processes, emissions units (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit or any operating permit revisions;
- (d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

C.4 Transfer of Ownership or Operation [326 IAC 2-6.1-6(d)(3)]
Pursuant to [326 IAC 2-6.1-6(d)(3)] :

- (a) In the event that ownership of this source is changed, the Permittee shall notify IDEM, OAQ, Permits Branch, within thirty (30) days of the change.
- (b) The written notification shall be sufficient to transfer the permit to the new owner by an notice-only change pursuant to 326 IAC 2-6.1-6(d)(3).
- (c) IDEM, OAQ, shall issue a revised permit.

The notification which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1.

C.5 Permit Revocation [326 IAC 2-1-9]

Pursuant to 326 IAC 2-1-9(a)(Revocation of Permits), this permit to operate may be revoked for any of the following causes:

- (a) Violation of any conditions of this permit.
- (b) Failure to disclose all the relevant facts, or misrepresentation in obtaining this permit.
- (c) Changes in regulatory requirements that mandate either a temporary or permanent reduction of discharge of contaminants. However, the amendment of appropriate sections of this permit shall not require revocation of this permit.
- (d) Noncompliance with orders issued pursuant to 326 IAC 1-5 (Episode Alert Levels) to reduce emissions during an air pollution episode.
- (e) For any cause which establishes in the judgment of IDEM, the fact that continuance of this permit is not consistent with purposes of this article.

C.6 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

Testing Requirements

C.7 Performance Testing [326 IAC 3-6]

- (a) Compliance testing on new emissions units shall be conducted within 60 days after achieving maximum production rate, but no later than 180 days after initial start-up, if specified in Section D of this approval. All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The Permittee shall submit a notice of the actual test date to the above address so that it is received at least two weeks prior to the test date.

- (b) All test reports must be received by IDEM, OAQ within forty-five (45) days after the completion of the testing. An extension may be granted by the IDEM, OAQ, if the source submits to IDEM, OAQ, a reasonable written explanation within five (5) days prior to the end of the initial forty-five (45) day period.

The documentation submitted by the Permittee does not require certification by the "authorized individual" as defined by 326 IAC 2-1.1-1.

Compliance Monitoring Requirements

C.8 Compliance Monitoring [326 IAC 2-1.1-11]

Compliance with applicable requirements shall be documented as required by this permit. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. All monitoring and record keeping requirements not already legally required shall be implemented when operation begins.

C.9 Monitoring Methods [326 IAC 3]

Any monitoring or testing required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, or other approved methods as specified in this permit.

C.10 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 1-6]

- (a) The Permittee is required to implement a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. This compliance monitoring plan is comprised of:
- (1) This condition;
 - (2) The Compliance Determination Requirements in Section D of this permit;
 - (3) The Compliance Monitoring Requirements in Section D of this permit;
 - (4) The Record Keeping and Reporting Requirements in Section C (Monitoring Data Availability, General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this permit; and
 - (5) A Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. CRP's shall be submitted to IDEM, OAQ upon request and shall be subject to review and approval by IDEM, OAQ. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee and maintained on site, and is comprised of:
 - (A) Response steps that will be implemented in the event that compliance related information indicates that a response step is needed pursuant to the requirements of Section D of this permit; and
 - (B) A time schedule for taking such response steps including a schedule for devising additional response steps for situations that may not have been predicted.
- (b) For each compliance monitoring condition of this permit, appropriate response steps shall be taken when indicated by the provisions of that compliance monitoring condition. Failure to perform the actions detailed in the compliance monitoring conditions or failure to take the response steps within the time prescribed in the Compliance Response Plan, shall constitute a violation of the permit unless taking the response steps set forth in the Compliance Response Plan would be unreasonable.
- (c) After investigating the reason for the excursion, the Permittee is excused from taking further response steps for any of the following reasons:
- (1) The monitoring equipment malfunctioned, giving a false reading. This shall be an excuse from taking further response steps providing that prompt action was taken to correct the monitoring equipment.
 - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied or;

- (3) An automatic measurement was taken when the process was not operating; or
- (4) The process has already returned to operating within “normal” parameters and no response steps are required.
- (d) Records shall be kept of all instances in which the compliance related information was not met and of all response steps taken.

Record Keeping and Reporting Requirements

C.11 Malfunctions Report [326 IAC 1-6-2]

Pursuant to 326 IAC 1-6-2 (Records; Notice of Malfunction):

- (a) A record of all malfunctions, including startups or shutdowns of any facility or emission control equipment, which result in violations of applicable air pollution control regulations or applicable emission limitations shall be kept and retained for a period of three (3) years and shall be made available to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) or appointed representative upon request.
- (b) When a malfunction of any facility or emission control equipment occurs which lasts more than one (1) hour, said condition shall be reported to OAQ, using the Malfunction Report Forms (2 pages). Notification shall be made by telephone or facsimile, as soon as practicable, but in no event later than four (4) daytime business hours after the beginning of said occurrence.
- (c) Failure to report a malfunction of any emission control equipment shall constitute a violation of 326 IAC 1-6, and any other applicable rules. Information of the scope and expected duration of the malfunction shall be provided, including the items specified in 326 IAC 1-6-2(a)(1) through (6).
- (d) Malfunction is defined as any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner. [326 IAC 1-2-39]

C.12 Annual Emission Statement [326 IAC 2-6]

- (a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received by April 15 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements:
 - (1) Indicate actual emissions of criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting);
 - (2) Indicate actual emissions of other regulated pollutants from the source, for purposes of Part 70 fee assessment.
- (b) The annual emission statement covers the twelve (12) consecutive month time period starting December 1 and ending November 30. The annual emission statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

- (c) The annual emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

The submittal by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1.

C.13 Monitoring Data Availability [326 IAC 2-6.1-2] [IC 13-14-1-13]

- (a) With the exception of performance tests conducted in accordance with Section C-Performance Testing, all observations, sampling, maintenance procedures, and record keeping, required as a condition of this permit shall be performed at all times the equipment is operating at normal representative conditions.
- (b) As an alternative to the observations, sampling, maintenance procedures, and record keeping of subsection (a) above, when the equipment listed in Section D of this permit is not operating, the Permittee shall either record the fact that the equipment is shut down or perform the observations, sampling, maintenance procedures, and record keeping that would otherwise be required by this permit.
- (c) If the equipment is operating but abnormal conditions prevail, additional observations and sampling should be taken with a record made of the nature of the abnormality.
- (d) If for reasons beyond its control, the operator fails to make required observations, sampling, maintenance procedures, or record keeping, reasons for this must be recorded.
- (e) At its discretion, IDEM may excuse such failure providing adequate justification is documented and such failures do not exceed five percent (5%) of the operating time in any quarter.
- (f) Temporary, unscheduled unavailability of staff qualified to perform the required observations, sampling, maintenance procedures, or record keeping shall be considered a valid reason for failure to perform the requirements stated in (a) above.

C.14 General Record Keeping Requirements [326 IAC 2-6.1-2]

- (a) Records of all required monitoring data and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years and available upon the request of an IDEM, OAQ, representative. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a written request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

- (b) Records of required monitoring information shall include, where applicable:
 - (1) The date, place, and time of sampling or measurements;
 - (2) The dates analyses were performed;
 - (3) The company or entity performing the analyses;
 - (4) The analytic techniques or methods used;
 - (5) The results of such analyses; and
 - (6) The operating conditions existing at the time of sampling or measurement.
- (c) Support information shall include, where applicable:
 - (1) Copies of all reports required by this permit;
 - (2) All original strip chart recordings for continuous monitoring instrumentation;
 - (3) All calibration and maintenance records;
 - (4) Records of preventive maintenance shall be sufficient to demonstrate that failure to implement the Preventive Maintenance Plan did not cause or contribute to a violation of any limitation on emissions or potential to emit. To be relied upon subsequent to any such violation, these records may include, but are not limited to: work orders, parts inventories, and operator's standard operating procedures. Records of response steps taken shall indicate whether the response steps were performed in accordance with the Compliance Response Plan required by Section C - Compliance Monitoring Plan - Failure to take Response Steps, of this permit, and whether a deviation from a permit condition was reported. All records shall briefly describe what maintenance and response steps were taken and indicate who performed the tasks.
- (d) All record keeping requirements not already legally required shall be implemented when operation begins.

C.15 General Reporting Requirements [326 IAC 2-1.1-11] [326 IAC 2-6.1-2] [IC 13-14-1-13]

- (a) To affirm that the source has met all the compliance monitoring requirements stated in this permit the source shall submit a Quarterly Compliance Monitoring Report. Any deviation from the requirements and the date(s) of each deviation must be reported. The Compliance Monitoring Report shall include the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (d) Unless otherwise specified in this permit, any quarterly or semi-annual report shall be submitted within thirty (30) days of the end of the reporting period. The report(s) does(do) not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (e) All instances of deviations must be clearly identified in such reports. A reportable deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:
 - (1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or
 - (2) A malfunction as described in 326 IAC 1-6-2; or
 - (3) Failure to implement elements of the Preventive Maintenance Plan unless lack of maintenance has caused or contributed to a deviation.
 - (4) Failure to make or record information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.

A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred or failure to monitor or record the required compliance monitoring is a deviation.
- (f) Any corrective actions or response steps taken as a result of each deviation must be clearly identified in such reports.
- (g) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period.

C.16 Annual Notification [326 IAC 2-6.1-5(a)(5)]

- (a) Annual notification shall be submitted to the Office of Air Quality stating whether or not the source is in operation and in compliance with the terms and conditions contained in this permit.
- (b) Noncompliance with any condition must be specifically identified. If there are any permit conditions or requirements for which the source is not in compliance at any time during the year, the Permittee must provide a narrative description of how the source did or will achieve compliance and the date compliance was, or will be, achieved. The notification must be signed by an authorized individual.
- (c) The annual notice shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in the format attached no later than March 1 of each year to:

Compliance Branch, Office of Air Quality
Indiana Department of Environmental Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, IN 46206-6015

- (d) The notification shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

SECTION D.1

EMISSIONS UNIT OPERATION CONDITIONS

- (1) Three (3) plastic parts surface coating booths, identified as Booths 1, 2, and 3, respectively, located in the spray coating building, with the particulate emissions from each booth controlled by a dry filter system, and the emissions exhausted through Stacks E1, E2, and E3, respectively,
- (2) One (1) 11.165 MMBtu/hr natural gas fired air make-up unit, identified as H1, located in the spray coating building,
- (3) Four (4) 0.1 MMBtu/hr natural gas fired radiant heaters, identified as H6, H7, H8, and H9, respectively, located in the warehouse building, and
- (4) Four (4) 0.3 MMBtu/hr natural gas fired space heaters, identified as H2, H3, H4, and H5, respectively, located in the warehouse building.

Emission Limitations and Standards

D.1.1 Volatile Organic Compound (VOC) Input Limit [326 IAC 8-1-6]

The owner or operator shall limit the combined input VOCs delivered to the applicators from surface coating booths 1, 2, and 3, to 24.6 tons per consecutive 12 month period, based on a 12 month rolling total.

D.1.2 Particulate Matter (PM) Overspray Limit [326 IAC 6-3-2(c)]

The owner or operator shall limit the particulate matter (PM) emissions from surface coating booths 1, 2, and 3, as follows:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

D.1.3 Preventive Maintenance Plan [326 IAC 1-6-3]

A Preventive Maintenance Plan, in accordance with Section C - Preventive Maintenance Plan, of this permit, is required for this emissions unit and any control devices.

D.1.4 Operation of Control Equipment

The dry filter systems of the paint booths shall be in operation at all times when the respective paint booth(s) is/are in operation.

Compliance Determination Requirements

D.1.5 Testing Requirements [326 IAC 2-1.1-11]

The owner or operator is not required to test any emission units under this section at this time. However, IDEM may require compliance testing when deemed necessary to determine if the emission units under this permit are in compliance. If testing is required by IDEM, compliance with the VOC input and PM overspray limits specified in Conditions D1.1 and D.1.2, shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.1.6 Compliance Determination, Paint Booth Input VOC Limit:

To determine compliance with the input VOC limit of Condition D.1.1, the owner or operator shall on a monthly basis, determine the input VOCs in tons per month, for the coatings, solvents, and any other VOC emitting materials utilized at surface coating booths 1, 2, and 3.

The input VOCs for each applicable material shall be determined using the following equation:

Material density (lb/gal) * wt. fraction VOC * material used (gal/month) * 1/2000 ton/lb = tons input VOC/month

The IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in this Condition.

D.1.7 Compliance Determination, Paint Booth PM Overspray Limits

The owner or operator shall determine compliance with the limit of Condition D.1.2 by

(a) verifying:

- (1) that the placement, integrity, and particle loading capacity of the filters is adequate,
- (2) that the dry filter system performance during normal coating booth operation is adequate,
and
- (3) that the paint booth emissions out of the stack are normal;

and

(b) performing all additional applicable preventive measures specified in the Preventive Maintenance Plan;

pursuant to the inspection and observation schedules established in Condition D.1.9.

Compliance Monitoring Requirements [326 IAC 2-5.1-3(e)(2)] [326 IAC 2-6.1-5(a)(2)]

D.1.8 Compliance Monitoring, Paint Booth Input VOC Limit

The owner or operator shall, on a monthly basis, record the input VOCs determined in Condition D.1.6.

D.1.9 Compliance Monitoring, Paint Booth PM Overspray Limit

The owner or operator shall, for the paint booth controls and exhaust:

- (a) perform daily inspections of each booth's dry filter system and record the results of said inspections, documenting whether or not the placement, integrity and particle loading of the filters is adequate,
- (b) perform weekly observations of the overspray emissions from paint booth stacks E1, E2, and E3, and record the results of said observations, documenting whether or not the dry filters are performing adequately during normal operation of the paint booth,
- (c) perform monthly inspections of the emissions from paint booth stacks E1, E2, and E3, and record the results of said inspections, documenting whether or not the emissions from the stacks are normal and if there is overspray present on the rooftops and the nearby ground,
and
- (d) perform all additional inspections and observations prescribed by the Preventive Maintenance Plan.

Should the owner or operator observe that the integrity and particle loading of the filters is not adequate, that the dry filters are not performing adequately during normal operation of the respective paint booth(s), that there is a noticeable change in overspray emissions from the respective stack(s) or surrounding evidence of abnormal overspray emissions, or that there are any parameters under the Preventive Maintenance Plan that are determined to be abnormal, the owner or operator shall take the appropriate response steps as specified in the Compliance Response Plan required in Condition C.10.

Record Keeping and Reporting Requirements [326 IAC 2-5.1-3(e)(2)] [326 IAC 2-6.1-5(a)(2)]

D.1.10 Record Keeping Requirements

- (a) To document compliance with the input VOC limit of Condition D.1.1, the owner or operator shall maintain records of the input VOCs required in Condition D.1.8.
- (b) To document compliance with the PM overspray limit of Condition D.1.2, the owner or operator shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan, as required in Condition D.1.9.

The records required under paragraphs (a) and (b) of this Condition shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.11 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.1.1 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

**Indiana Department of Environmental Management
Office of Air Quality
Compliance Data Section**

Quarterly Report

Company Name: Elk Properties, LLC.
Location: Elkhart, Indiana
Permit No.: 039-15151-00357
Source/Facility: Surface Coating Booths 1, 2, and 3
Pollutant: volatile organic compounds (VOC)
Limit: 24.6 tons per 12 month consecutive period, based on a 12 month rolling total

Month: _____ Year: _____

	(A) Input VOCs This Month (tons)	(B) Input VOCs Last 11 Months (tons)	(A) + (B) Total Input VOCs (tons)
Booth 1			
Booth 2			
Booth 3			
Total			

Please calculate the input VOCs of each applicable material from each booth using the following equation.

Material density (lb/gal) * wt. fraction VOC * material used (gal/month) * 1/2000 ton/lb = tons input VOC/month

Submitted by: _____

Title/Position: _____

Signature: _____

Date: _____

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE BRANCH**

**MINOR SOURCE OPERATING PERMIT
ANNUAL NOTIFICATION**

This form should be used to comply with the notification requirements under 326 IAC 2-6.1-5(a)(5).

Company Name:	Elk Properties, LLC.
Address:	3008 Mobile Drive
City:	Elkhart, Indiana 46514
Phone #:	
MSOP #:	039-15151-00357

I hereby certify that Elk Properties, LLC. is

- 9 still in operation.
- 9 no longer in operation.

I hereby certify that Elk Properties, LLC. is

- 9 in compliance with the requirements of MSOP 039-15151-00357.
- 9 not in compliance with the requirements of MSOP 039-15151-00357.

Authorized Individual (typed):
Title:
Signature:
Date:

If there are any conditions or requirements for which the source is not in compliance, provide a narrative description of how the source did or will achieve compliance and the date compliance was, or will be achieved.

Noncompliance:

MALFUNCTION REPORT

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
FAX NUMBER - 317 233-5967**

**This form should only be used to report malfunctions applicable to Rule 326 IAC 1-6
and to qualify for the exemption under 326 IAC 1-6-4.**

THIS FACILITY MEETS THE APPLICABILITY REQUIREMENTS BECAUSE IT HAS POTENTIAL TO EMIT 25 TONS/YEAR PARTICULATE MATTER ?_____, 25 TONS/YEAR SULFUR DIOXIDE ?_____, 25 TONS/YEAR NITROGEN OXIDES?_____, 25 TONS/YEAR VOC ?_____, 25 TONS/YEAR HYDROGEN SULFIDE ?_____, 25 TONS/YEAR TOTAL REDUCED SULFUR ?_____, 25 TONS/YEAR REDUCED SULFUR COMPOUNDS ?_____, 25 TONS/YEAR FLUORIDES ?_____, 100TONS/YEAR CARBON MONOXIDE ?_____, 10 TONS/YEAR ANY SINGLE HAZARDOUS AIR POLLUTANT ?_____, 25 TONS/YEAR ANY COMBINATION HAZARDOUS AIR POLLUTANT ?_____, 1 TON/YEAR LEAD OR LEAD COMPOUNDS MEASURED AS ELEMENTAL LEAD ?_____, OR IS A SOURCE LISTED UNDER 326 IAC 2-5.1-3(2) ?_____. EMISSIONS FROM MALFUNCTIONING CONTROL EQUIPMENT OR PROCESS EQUIPMENT CAUSED EMISSIONS IN EXCESS OF APPLICABLE LIMITATION _____.

THIS MALFUNCTION RESULTED IN A VIOLATION OF: 326 IAC _____ OR, PERMIT CONDITION # _____ AND/OR PERMIT LIMIT OF _____

THIS INCIDENT MEETS THE DEFINITION OF 'MALFUNCTION' AS LISTED ON REVERSE SIDE ? Y N

THIS MALFUNCTION IS OR WILL BE LONGER THAN THE ONE (1) HOUR REPORTING REQUIREMENT ? Y N

COMPANY: _____ PHONE NO. () _____

LOCATION: (CITY AND COUNTY) _____

PERMIT NO. _____ AFS PLANT ID: _____ AFS POINT ID: _____ INSP: _____

CONTROL/PROCESS DEVICE WHICH MALFUNCTIONED AND REASON: _____

DATE/TIME MALFUNCTION STARTED: ____/____/19____ AM / PM

ESTIMATED HOURS OF OPERATION WITH MALFUNCTION CONDITION: _____

DATE/TIME CONTROL EQUIPMENT BACK-IN SERVICE ____/____/19____ AM/PM

TYPE OF POLLUTANTS EMITTED: TSP, PM-10, SO₂, VOC, OTHER: _____

ESTIMATED AMOUNT OF POLLUTANT EMITTED DURING MALFUNCTION: _____

MEASURES TAKEN TO MINIMIZE EMISSIONS: _____

REASONS WHY FACILITY CANNOT BE SHUTDOWN DURING REPAIRS:

CONTINUED OPERATION REQUIRED TO PROVIDE ESSENTIAL* SERVICES: _____

CONTINUED OPERATION NECESSARY TO PREVENT INJURY TO PERSONS: _____

CONTINUED OPERATION NECESSARY TO PREVENT SEVERE DAMAGE TO EQUIPMENT: _____

INTERIM CONTROL MEASURES: (IF APPLICABLE) _____

MALFUNCTION REPORTED BY: _____ TITLE: _____
(SIGNATURE IF FAXED)

MALFUNCTION RECORDED BY: _____ DATE: _____ TIME: _____

*SEE PAGE 2

**Please note - This form should only be used to report malfunctions
applicable to Rule 326 IAC 1-6 and to qualify for
the exemption under 326 IAC 1-6-4.**

326 IAC 1-6-1 Applicability of rule

Sec. 1. This rule applies to the owner or operator of any facility required to obtain a permit under 326 IAC 2-5.1 or 326 IAC 2-6.1.

326 IAC 1-2-39 "Malfunction" definition

Sec. 39. Any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner.

***Essential services** are interpreted to mean those operations, such as, the providing of electricity by power plants. Continued operation solely for the economic benefit of the owner or operator shall not be sufficient reason why a facility cannot be shutdown during a control equipment shutdown.

If this item is checked on the front, please explain rationale:

Indiana Department of Environmental Management Office of Air Quality

Technical Support Document (TSD) for a Minor Source Operating Permit (MSOP)

Source Background and Description

Source Name:	Elk Properties, LLC.
Source Location:	3008 Mobile Drive, Elkhart, IN 46514
County:	Elkhart
Construction Permit No.:	CP-039-4972-00357
Operation Permit Issuance Date:	March 14, 1996
Minor Source Operating Permit No.:	039-15151-00357
Permit Reviewer:	SDF

The Office of Air Quality (OAQ) has reviewed an application from Image Truck Accessories requesting that the source name be changed from Image Truck Accessories to Elk Properties, LLC.

History

On November 13, 2001, Image Trucking Accessories submitted an application requesting that the source name be changed from Image Truck Accessories to Elk Properties, LLC because the source has been sold to Elk Properties, LLC.

This application is being reviewed to change the name of the company, acknowledge the new ownership, and to permit the source as required under 326 IAC 2-6.1-3. Pursuant to 326 IAC 2-6.1-3, any existing source that has a valid operating permit and is not subject to the requirements of 326 IAC 2-7, 326 IAC 2-8, 326 IAC 2-9, 326 IAC 2-10, or 326 IAC 2-11, shall submit an application no later than 90 days prior to the expiration date of the permit.

Image Trucking Accessories, now Elk Properties, LLC. is not subject to 326 IAC 2-7, 2-8, 2-9, 2-10, or 2-11 and the validation letter of the original construction permit was post marked August 12, 1996. Therefore, the application should have been submitted on May 12, 2001, which is the date that is 90 days prior to the expiration date of August 12, 2001.

Elk Properties, LLC. is a plastic parts coating operation consisting of:

- (1) Three (3) plastic parts surface coating booths, identified as Booths 1, 2, and 3, respectively, located in the spray coating building, with the particulate emissions from each booth controlled by a dry filter system, and the emissions exhausted through Stacks E1, E2, and E3, respectively,
- (2) One (1) 11.165 MMBtu/hr natural gas fired air make-up unit, identified as H1, located in the spray coating building,
- (3) Four (4) 0.1 MMBtu/hr natural gas fired radiant heaters, identified as H6, H7, H8, and H9, respectively, located in the warehouse building, and
- (4) Four (4) 0.3 MMBtu/hr natural gas fired space heaters, identified as H2, H3, H4, and H5, respectively, located in the warehouse building.

Existing Approvals

The source was issued CP 039-4972-00357 on March 14, 1996. The source has been operating under this permit, Amendment 039-5499-00357, issued on March 22, 1996, and Amendment 039-11062-00357, issued on July 28, 1999.

Stack Summary

Stack ID	Equipment	Stack Height (ft)	Stack Diameter (ft)	Discharge Temperature (°F)	Air Flow Rate (acfm)
H1	air make-up	direct exchange	N/A	variable	variable
H2	space heater	30	0.66	500	275
H3	space heater	30	0.66	500	275
H4	space heater	30	0.66	500	275
H5	space heater	30	0.66	500	275
H6	radiant heater	30	0.33	500	175
H7	radiant heater	30	0.33	500	175
H8	radiant heater	30	0.33	500	175
H9	radiant heater	30	0.33	500	175
E1	spray booth 1	20	2.00	5490	ambient
E2	spray booth 2	20	2.00	5490	ambient
E3	spray booth 3	20	2.00	5490	ambient
E4	general ventilation	20	2.00	5490	ambient
E5	general ventilation	20	2.00	5490	ambient
E6	general ventilation	20	2.00	5490	ambient

Enforcement Issue

An enforcement referral is being submitted along with this application for failure to submit a timely application pursuant to 326 IAC 2-6.1-3.

Recommendation

The staff recommends to the Commissioner that the Minor Source Operating Permit (MSOP) be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application.

Emission Calculations

UNRESTRICTED POTENTIAL TO EMIT (UPTE) DUE TO THE MODIFICATION:

The emissions generated by the source include PM, PM10, VOCs, and HAPs generated by the three paint booths, and natural gas combustion emissions from the air make-up unit, and radiant and space heaters.

The following table summarizes the UPTE from the proposed equipment. The detailed UPTE calculations follow the summary table.

Unit	PM (tons/yr)	PM10 (tons/yr)	SO2 (tons/yr)	NOx (tons/yr)	VOC (tons/yr)	CO (tons/yr)	Comb. HAPs (tons/yr)
Coating Booths	7.97	7.97	-	-	73.57	-	9.50
Combustion	0.10	0.10	neg.	5.60	0.30	4.70	neg.
Total	8.07	8.07	neg.	5.60	73.87	4.70	9.50

a. Paint Booths 1, 2, and 3:

The following calculations determine the PM, PM10, VOC and HAP UPTE based on 3 surface coating booths, use of the worst case coating combination, the respective maximum gal/unit, the maximum units/hr, the chemical properties of the coatings as obtained from the MSDS, emissions before controls, and 8760 hours of operation.

$$\text{VOC: VOC (tons/yr)} = 3 * [\text{lb/gal} * \text{fraction VOC} * \text{gal/unit} * \text{unit/hr} * 8760 \text{ hr/yr} * 1/2000 \text{ ton/lb}]$$

Coating	lb/gal	fraction VOC	maximum gal/unit	maximum unit/hr	VOC (ton/yr)
Paint	9.20	0.66	0.09	3.00	21.54
Clearcoat/Hardener	8.20	0.54	0.14	3.00	24.44
Thinner	7.00	1.00	0.10	3.00	27.59
Total					73.57

$$\text{PM: PM (tons/yr)} = 3 * [\text{lb/gal} * \text{gal/unit} * \text{unit/hr} * (1\text{-wt\% VOC}) * (1\text{-}0.75) * 8760 \text{ hr/yr} * 1/2000 \text{ ton/lb}]$$

Coating	lb/gal	maximum gal/unit	maximum unit/hr	Fraction VOC	fraction transfer efficiency (TE)	PM* (ton/yr)
Paint	9.20	0.09	3.00	0.66	0.75	2.77
Clearcoat/Hardener	8.20	0.14	3.00	0.54	0.75	5.20
Thinner	7.00	0.10	3.00	1.00	0.75	0.00
Total						7.97

PM10 is determined to be equal to PM in this case.

HAP: $\text{HAP (tons/yr)} = \text{lb/hr} * 8760 \text{ hr/yr} * 1/2000 \text{ ton/lb}$

Coating	lb/hr	HAP (ton/yr)
Ethyl Benzene	0.24	1.05
Hexamethylene-1, 6-diisocyanate	0.002	0.01
Methanol	0.087	0.38
MEK	0.043	0.19
MIK	0.022	0.10
Toluene	0.348	1.52
Xylene	1.428	6.25
Total		9.50

The worst case single and combined HAP emissions are less than their respective applicable Part 70 levels of 10 and 25 tons per year.

b. Combustion Unit Emissions:

The following calculations determine the air make-up unit, and space and radiant heater natural gas combustion emissions based on natural gas combustion, a combined maximum capacity of 12.77 MMBtu/hr, AP-42 emission factors, emissions before controls, and 8760 hours of operation.

$12.77 \text{ MMBtu/hr} * 8760 \text{ hr/yr} * 1 \text{ E6 Btu/MMBtu} * 1/1000 \text{ cf/Btu} * 1/1\text{E6 MMcf/cf} * \text{Ef lb poll/MMcf} * 1/2000 \text{ ton poll/lb poll} = \text{ton poll/yr}$

	PM 7.6 lb/MMcf	PM10 7.6 lb/MMcf	SO2 0.6 lb/MMcf	NOx 100 lb/MMcf	VOC 5.5 lb/MMcf	CO 84 lb/MMcf
ton/yr	0.10	0.10	neg.	5.60	0.30	4.70

EMISSIONS AFTER CONTROLS:

The surface coating booth PM and PM10 emissions are controlled by dry filters, each, with an overall control efficiency of 95%. The following calculations determine the surface coating booth PM and PM10 emissions after controls.

$7.97 \text{ tons PM/yr} * (1 - 0.95) = 0.40$

All other pollutant emissions are uncontrolled.

The following table lists the source emissions after controls.

Unit	PM (tons/yr)	PM10 (tons/yr)	SO2 (tons/yr)	NOx (tons/yr)	VOC (tons/yr)	CO (tons/yr)	Comb. HAPs (tons/yr)
Coating Booths	0.40	0.40	-	-	73.57	-	9.50
Combustion	0.10	0.10	neg.	5.60	0.30	4.70	neg.
Total	0.50	0.50	neg.	5.60	73.87	4.70	9.50

LIMITED EMISSIONS

The source has agreed to limit the combined surface coating booth input VOCs to 24.6 tons per year, based on a 12 month rolling total, to avoid the requirements of 326 IAC 8-1-6.

The source emissions after controls, after application of the production limit, are as follows:

Unit	PM (tons/yr)	PM10 (tons/yr)	SO2 (tons/yr)	NOx (tons/yr)	VOC (tons/yr)	CO (tons/yr)	Comb. HAPs (tons/yr)
Coating Booths	0.40	0.40	-	-	24.60	-	9.50
Combustion	0.10	0.10	neg.	5.60	0.30	4.70	neg.
Total	0.50	0.50	neg.	5.60	24.90	4.70	9.50

Since the VOC emissions are limited to less than the applicable level of 25 tons per year, 326 IAC 8-1-6 does not apply to the 3 surface coating booths.

Potential To Emit

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as “the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U.S. EPA.”

This table reflects the source PTE before controls based on the above estimated emissions calculations. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Pollutant	Potential To Emit (tons/year)
PM	8.07
PM-10	8.07
SO ₂	neg.
VOC	73.87
CO	4.70
NO _x	5.60

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

Worst Case Single HAP (tons/yr)	Combined HAP(tons/year)
6.25	9.50

Level of Permit

All criteria pollutant UPTE are less than 100 tons/yr, no single HAP emissions exceed 10 tons/yr, the combined HAP emissions do not exceed 25 tons/yr, but the VOC emissions exceed the applicable level of 25 tons/yr. Therefore, the source qualifies for a Minor Source Operating Permit, pursuant to 326 IAC 2-6.1-2.

County Attainment Status

The source is located in Elkhart County.

Pollutant	Status
PM ₁₀	attainment or unclassifiable
SO ₂	attainment or unclassifiable
NO ₂	attainment or unclassifiable
Ozone	maintenance attainment
CO	attainment or unclassifiable
Lead	attainment or unclassifiable

(a) Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Elkhart County has been designated as maintenance attainment for ozone. Therefore, VOC emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration, 326 IAC 2-2 and 40 CFR 52.21.

(b) Elkhart County has been classified as attainment or unclassifiable for all criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.

(c) Fugitive Emissions

Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive PM emissions are not counted toward determination of PSD and Emission Offset applicability.

Source Status

Existing Source PSD Definition (emissions after controls, based upon 8760 hours of operation per year at rated capacity and/or as otherwise limited):

Unit	PM (tons/yr)	PM10 (tons/yr)	SO2 (tons/yr)	NOx (tons/yr)	VOC (tons/yr)	CO (tons/yr)	Comb. HAPs (tons/yr)
Coating Booths	0.40	0.40	-	-	24.60	-	9.50
Combustion	0.10	0.10	neg.	5.60	0.30	4.70	neg.
Total	0.50	0.50	neg.	5.60	24.90	4.70	9.50

PSD Major Source Levels	250	250	250	250	250	250	-
Part 70 Major Source Levels	-	100	100	100	100	100	10/25

- (a) This existing source is not a major PSD stationary source because no regulated pollutant is emitted at a rate of 250 tons per year or more and it is not one of the 28 listed source categories.
- (b) This existing source is not a Title V major stationary source because no criteria pollutant potential to emit (PTE) exceeds the applicable level of 100 tons/yr, no single hazardous air pollutant PTE exceeds the applicable levels of 10 tons/yr, and the combined hazardous air pollutant PTE does not exceed the applicable level of 25 tons/yr.

Federal Rule Applicability

New Source Performance Standards (NSPS):

There are no New Source Performance Standards (326 IAC 12 and 40 CFR Part 60) that apply to the proposed source.

National Emission Standards for Hazardous Air Pollutants (NESHAPs):

There are no National Emission Standards for Hazardous Air Pollutants (326 IAC 14 and 20 and 40 CFR Part 61 and 63) that apply to this proposed source.

State Rule Applicability

Entire State Rule Applicability:

326 IAC 1-6-3 (Preventive Maintenance Plan):

The proposed source is required to have a preventive maintenance plan for the emission units and control devices of the source.

326 IAC 2-4.1 (HAP Major Sources)

This source is not subject to the requirements of 326 IAC 2-4.1 because no single hazardous air pollutant (HAP) emissions exceed 10 tons per year, and the combined HAP emissions are less than 25 tons per year.

326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting), because it is located in Elkhart County and has VOC PTE greater than 10 tons per year.

Pursuant to 326 IAC 2-6, the owner or operator shall submit annually, an emission statement. The annual emission statement shall be received by April 15 of each year and must contain, at a minimum, the requirements specified in 326 IAC 2-6-4.

326 IAC 5-1-2 (Opacity Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

Individual State Rule Applicability

326 IAC 6-3 (Process Operations), Paint Booth:

Pursuant to 326 IAC 6-3-2, the particulate matter (PM) emissions from the paint booths shall not exceed the limits established utilizing the following equation:

$$E = 4.10 * P^{0.67}$$

where: E = rate of emission in pounds per hour,
P = process weight in tons per hour

326 IAC 8-2-9 (Miscellaneous Metal Coating Operations)

The paint booths are not subject to 326 IAC 8-2-9 because the coatings are applied to plastic parts.

326 IAC 8-1-6 BACT Requirements

The source is not subject to the requirements of 326 IAC 8-1-6 because the Elk Properties, LLC. has agreed to a VOC input limit of 24.6 tons per year which reduces the source VOC emissions to less than the 326 IAC 8-1-6 applicable level of 25 tons per year. Therefore, 326 IAC 8-1-6 does not apply.

The spray booths are considered one process because the three booths apply the same coatings, and the plastic parts can be coated in any one, two, or all of the three booths at the same time.

Conclusion

This plastic parts coating operation shall be operated according to the requirements specified in **MSOP No. 039-15151-00357**.